

United States District Court  
Western District of Texas  
San Antonio Division

C.M. on his own behalf and on behalf of his  
minor child, D.V.,

Plaintiffs,

v.

United States of America,

Defendant.

Case No. SA-21-CV-00234-JKP-ESC

Joint Motion to Stay Proceedings

Plaintiffs, by and through undersigned counsel, and Defendant, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, hereby respectfully request a stay of proceedings in this case, and in support thereof would respectfully show as follows:

1. Plaintiffs' Complaint was filed on March 8, 2021.
2. Defendant's deadline to file a responsive pleading is July 27, 2021.
3. The parties previously agreed to a 60-day stay of this matter so that the parties could facilitate the resolution of this matter. This stay is set to expire.
4. The United States, along with a group of counsel who are coordinating negotiations on behalf of plaintiffs and claimants, are engaged in a nationwide effort to settle district court cases and pending administrative tort claims arising from family separations at the U.S./Mexico border that occurred during the prior administration. While significant progress has been made, due to the scale and complexity of the effort, additional time is needed to achieve a global resolution of these matters.
5. Therefore, the parties respectfully request an additional 60-day stay and extension of Defendant's deadline to file responsive deadline, as set forth in the proposed order submitted herewith.

6. This stay is not sought for purpose of delay but to facilitate the resolution of this matter.

WHEREFORE, the parties respectfully request that the Court stay the proceedings in this case for 60 days and extend Defendant's deadline to file a responsive pleading until September 27, 2021.

Respectfully submitted,

Ashley C. Hoff  
United States Attorney

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Certificate of Service

I certify that on July 13, 2021, a true and correct copy of the foregoing Joint Motion to Stay Proceedings was electronically filed via the Court's CM/ECF system which will send notice to the following:

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